

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DEBRA BECKER,

Plaintiffs,

Docket No.: 21-cv-02855 (EK) (ST)

-against-

NASSAU BOCES SCHOOL DISTRICT;
BOARD OF COOPERATIVE EDUCATIONAL SERVICES
OF NASSAU COUNTY (NASSAU BOCES);
DR. ROBERT DILLON, Individually and as
District Superintendent of the Board of Cooperative
Educational Services of Nassau County;
DR. TRACEY NEKULAK, Individually, and as
Executive Director of Human Resources of the
Board of Cooperative Educational Services of Nassau
County; KIM SCHAROFF, Individually, and as Supervisor
1-Speech Language and Hearing Services at the
Board of Cooperative Educational Services of Nassau
County; PATRICIA SCHWETZ, Individually, and as
Assistant Director at the Board of Cooperative
Educational Services of Nassau County;
DR. RANDALL SOLOMON;
ISLAND PSYCHIATRY, PC; and
JOHN DOE AND JANE DOE # 1-100, said names
being fictitious, it being the intent of Plaintiff
to designate any and all individuals, officers, members,
agents, servants, and/or employees of the
aforementioned agencies owing a duty of care to
Plaintiff, individually and jointly and severally,

Defendants.

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DECLARATION OF THOMAS F. LIOTTI IN OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS THE PLAINTIFF'S
AMENDED VERIFIED COMPLAINT

THOMAS F. LIOTTI, ESQ., hereby declares pursuant to 29 U.S.C §1746:

1. I am the principal attorney with the Law Offices of Thomas F. Liotti, LLC,
attorneys for the Plaintiff, Debra Becker ("Plaintiff"), and I am admitted to practice in this Court.
As such, I am fully familiar with the facts and circumstances of this matter.


2. I submit this Declaration together with the Plaintiff's Memorandum of Law in Opposition to the Nassau BOCES Defendants' Motion to Dismiss Plaintiff's Amended Verified Complaint; and for such other and further relief as this Court deems to be just and proper.

3. It is the Plaintiff's intention to incorporate the facts and claims duly raised in the Plaintiff's Amended Complaint filed August 17, 2021, which has been verified by the Plaintiff, as though they were fully set forth herein.

4. Based on the foregoing the relief requested by the Nassau BOCES Defendants should be denied in its entirety; and such other and further relief should be granted to the Plaintiff, as to this Court may seem just and proper.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: Garden City, New York
October 21, 2021


THOMAS F. LIOTTI (TL4471)